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MEMO ENDORSED

September 13, 2021

VIA ECF

Honorable Barbara Moses
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 100071

Re: *Zaida Borges v. Commissioner of Social Security*,
Civil Action No. 1:20-cv-09748-GBD-BCM

Dear Judge Moses,

We write on behalf of plaintiff, Zaida Borges, and with the consent of the defendant, to request a 30-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on September 13, 2021. Plaintiff respectfully requests an extension of time up to and including October 12, 2021. This is plaintiff's first request for an extension.

The delay in preparation of the Administrative Records due to COVID-related issues, and the recent easing of those problems, has resulted in numerous closely scheduled (and overlapping) briefing deadlines. We hope and expect that the easing will continue over the next several months and that by the end of the year, neither the Agency nor the claimants will need to request as many modifications to the briefing schedules as have been requested in the past.

At this time, plaintiff Zaida Borges respectfully requests the following revised briefing schedule:

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- a. Plaintiff to serve his motion for judgment on the pleadings on or before **October 12, 2021**;
- b. Defendant to serve its response/cross-motion on or before **December 13, 2021**; and
- c. Plaintiff to serve his reply (if any) on or before **January 3, 2022**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Joseph Anthony Pantoja, Esq. (by ECF)

Application GRANTED. No further extensions of plaintiff's motion deadline will be granted. SO ORDERED.



Barbara Moses
United States Magistrate Judge
September 14, 2021